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November 1, 1999

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VIA HAND DELIVERY

Mr. David Waddell **Executive Secretary** Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37201

Re:

Rulemaking Proceeding - Regulatory Reform Rules Regarding Interexchange Carriers - Rules 1220-4-2-.55(2)

Docket No. 98-00097

Dear Mr. Waddell:

Enclosed for filing are the original and thirteen copies of the Reply of AT&T Communications of the South Central States, Inc. to Motion of Consumer Advocate Division to File Reply Comments. A copy of the Reply has been served upon all known parties of record.

Yours very truly.

VS/ghc **Enclosures**

cc:

Susan Berlin, Esq, Charles B. Welch, Jr., Esq. Vance Broemel, Esq. Jon E. Hastings, Esq. James Wright, Esq. James P. Lamoureux, Esq.

Garry Sharp

BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

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IN RE:

Rulemaking Proceeding - Regulatory Reform Rules regarding Interexchange Carriers - Rules 1220-4-2-.55(2)

Docket No. 98-00097

REPLY OF AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC. TO MOTION OF CONSUMER ADVOCATE DIVISION TO FILE REPLY COMMENTS

The CAD's Motion to File Reply Comments should be denied, on the following grounds:

- 1. The TRA established a filing schedule which required all comments to be filed by October 18, 1999. No provision was made for filing reply comments. The CAD should be subject to the same rules as all others. The CAD had the same opportunity as all others to file comments concerning such topics as it thought appropriate. There is no justification for reopening the comment process to accommodate the CAD.
- 2. The issue which the CAD seeks to address is peripheral and not determinative and no useful purpose would be served by adding the CAD's affidavit to the record.



Respectfully submitted,

Val Sanford, #3316

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Attorneys for AT&T Communications of the South Central States, Inc.

CERTIFICATE OF SERVICE

I, Val Sanford, hereby certify that a copy of the foregoing Reply of AT&T Communications of the South Central States, Inc. was served on the following persons via United States Mail, Postage prepaid and addressed as follows, this 1st day of November, 1999.

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